

# **EXHIBIT EE**

**From:** [Arjun Vasan](#)  
**To:** [Makitalo, Rebecca I.](#)  
**Cc:** [Keech, Ryan Q.](#); [Chiu, Stacey G.](#); [Winningham, Jacob R.](#)  
**Subject:** Re: Arjun Vasan v. Checkmate.com, Inc. - 2:25-cv-00765-MEMF-ASx  
**Date:** Monday, October 27, 2025 4:12:53 PM

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Counsel,

I would note that Judge Sagar's procedures expressly "encourages the parties to avail themselves of the Court's Informal Discovery Dispute Resolution process set forth below", as she finds the process "useful and efficient to address a discrete dispute, scheduling issues, or recalcitrant misconduct in discovery."

I believe we are at such an impasse, and could benefit from guidance on how to proceed. If you refuse to participate, this will be raised in my forthcoming declaration.

Best regards,  
Arjun Vasan

On Mon, Oct 27, 2025 at 2:57 PM Arjun Vasan <[arjun.vasan@gmail.com](mailto:arjun.vasan@gmail.com)> wrote:  
Counsel,

I think the meet and confer record is clear. Checkmate refused to meet on any of these issues unless I "first" met on its issue. The rule is 10 days, not whether your own issue conferred on. I already sent you several L.R. 37-1 letters. If you are willing to accept an informal discovery conference, I would prefer the Magistrate Judge provide guidance. Otherwise, I will proceed with the motion, as stated, on Friday.

Best regards,  
Arjun Vasan

On Mon, Oct 27, 2025 at 2:31 PM Makitalo, Rebecca I. <[Rebecca.Makitalo@klgates.com](mailto:Rebecca.Makitalo@klgates.com)> wrote:

Mr. Vasan,

You have not complied with the Rule 37-1 meet and confer requirement for your proposed discovery motion. You must first request to confer *in good faith* and prepare and transmit to Checkmate a letter that: (1) identifies each disputed issue and/or discovery request; (2) succinctly states your position as to each, including any dispositive legal authority; and (3) specifies the exact terms of the discovery order you seek. After having satisfied Rule 37-1, you are to provide a proper joint stipulation in full compliance with Rule 37-2, with only Checkmate's respective sections left to be completed.

Please proceed accordingly.

Thank you,

**Rebecca Makitalo**

Associate

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**From:** Arjun Vasan <[arjun.vasan@gmail.com](mailto:arjun.vasan@gmail.com)>

**Sent:** Friday, October 24, 2025 12:14 PM

**To:** Keech, Ryan Q. <[Ryan.Keech@klgates.com](mailto:Ryan.Keech@klgates.com)>; Chiu, Stacey G. <[Stacey.Chiu@klgates.com](mailto:Stacey.Chiu@klgates.com)>;  
Makitalo, Rebecca I. <[Rebecca.Makitalo@klgates.com](mailto:Rebecca.Makitalo@klgates.com)>; Winningham, Jacob R.  
<[Jacob.Winningham@klgates.com](mailto:Jacob.Winningham@klgates.com)>

**Subject:** Arjun Vasan v. Checkmate.com, Inc. - 2:25-cv-00765-MEMF-ASx

Counsel,

Attached please find Plaintiff's portions of the L.R. 37 Joint Stipulation regarding the sufficiency of Checkmate's RFA responses (Sets One–Three). This joint stip tracks Judge Sagar's procedures and L.R. 37.

In the spirit of narrowing disputes, I've grouped RFAs with identical defects and identified a small subset for deeming admitted (objective MIME/filename/URL/body-term items) while proposing that the remainder be cured by Rule-compliant amended answers describing the "reasonable inquiry" required by FRCP 36(a)(4).

Please return your "Opposing Party's Contentions" sections (or proposed amended

answers obviating the issue) within 7 days. If I do not receive your portions by then, I will file my motion supported by a declaration attaching this draft and my L.R. 37-1 correspondence. I've attached the word version as well as proposed attachments from my end.

I remain available to meet and confer at your convenience this upcoming week, only on this issue, either in Cerritos, California or remotely.

Regards,  
Arjun Vasana, Plaintiff in Pro Per

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